



NEW YORK

CALIFORNIA

GEORGIA

PENNSYLVANIA

Innessa M. Huot
ihuot@faruqilaw.com

March 28, 2025

VIA ECF

The Honorable Sarah L. Cave
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 18A
New York, New York 10007

Re: *Piney, et al. v. City of New York, et al.*, No. 1:25-cv-00671-DEH-SLC

Dear Judge Cave:

We represent Plaintiffs and the proposed Class and FLSA Collective. Pursuant to the Court's Order (ECF No. 259), Plaintiffs submit the attached Service Chart detailing the dates upon which every Defendant was served and the ECF entry corresponding to each Defendant's certificate of service. *See* Exhibit A. As previously noted, all Defendants have been served.

To avoid confusion, we note that Defendant Torah Umesorah, Inc. ("Umesorah") was already served on March 19, 2025 (ECF No. 284). On or around March 26, 2025, Umesorah contacted undersigned to explain that they received Plaintiffs' pleadings and while there may be some affiliation between Umesorah and Torah Academy High School for Girls d/b/a Torah Academy for Girls ("Torah Girls"), they are not "doing business as" those entities. Plaintiffs are investigating Umesorah's contentions, and the parties are conferring regarding same.

Out of an abundance of caution, Plaintiffs immediately served Torah Girls the following day, on March 27, 2025. Plaintiffs filed the certificate of service for Torah Girls (ECF No 307). However, because Torah Girls is not listed as a separate Defendant, the ECF filing system would not permit the designation of the certificate of service for Torah Girls. As such, we filed the certificate of service as one for Umesorah even though that Defendant was already served on March 19, 2025.

We write this letter to clarify the issue and avoid confusion as the ECF filing system did not provide us with a different option.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'I. Huot', is written over a horizontal line.

Innessa M. Huot